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January 17, 2025

Via ECF

The Honorable Naomi R. Buchwald
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007

Re: ***Cequel Communications, LLC d/b/a Suddenlink Communications v. Mox Networks, LLC, No. 21-cv-5577***

Dear Judge Buchwald:

Counsel for Plaintiff, Cequel Communications, LLC d/b/a Suddenlink Communications, and for Defendant, MOX Networks, LLC (together, the “Parties”) jointly write to respectfully request a further extension of the deadline to file a proposed schedule for the resolution of the outstanding claims in this matter. On August 23, 2024, the Court issued a Memorandum and Order (the “August 23 Order”) granting Plaintiff’s motion for summary judgment on its first three claims for breach of contract and denying Defendant’s cross-motion for partial summary judgment. *See* ECF No. 88. The Court directed the Parties, if unable to resolve the remaining claims, to file a proposed schedule for their resolution within 45 days of the August 23 Order. *Id.*

Since the August 23 Order, the Parties have engaged in good faith negotiations in efforts to resolve the remaining claims. The Parties have jointly requested extensions of the deadline to file the proposed schedule three times, on October 4, 2024, October 21, 2024, and November 22, 2024. *See* ECF No. 89, 91, & 93. The Court granted all three requests. *See* ECF No. 90, 92, & 94. The deadline to submit a proposed schedule is currently January 21, 2025.

Since the last extension request, the Parties have continued to engage in good faith negotiations and to spend substantial time working on the technical aspects of a potential resolution. The Parties respectfully request to extend the deadline to file a proposed schedule for resolving the remaining claims to February 28, 2025. This is the Parties’ fourth request for an extension of this deadline and this request does not affect any other scheduled dates.

Naomi R. Buchwald,
1/21/25
USDS

*Application
granted*

Thank you for Your Honor's attention to this matter.

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